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June 7, 2018

VIA ECF

Honorable Magistrate Judge Ramon E. Reyes, Jr
United States District Court, EDNY

RE: Bonikos et al v. 50 Front Street Enterprises, Inc., 1:17-cv-06076-ARR-RER

Dear Honorable Judge,

I represent Plaintiffs Yannis Bonikos and Rigel Shaholli (the "Plaintiffs") in the above-referenced action. I write jointly with Defendants' counsel to advise the Court about the status of the case in accordance with Your Honor's Order dated May 23, 2018 and to request an extension of time to complete discovery. Respectfully, this letter should override my June 6, 2018 letter which was written with haste in light of the situation.

Unfortunately, the case could not be settled in mediation. The parties negotiated for 4-5 hours on May 30th before Ms. Deborah Shapiro until the negotiations fell apart. The parties were simply too far apart for a resolution to occur, but the mediation aided in airing out the parties' claims/defenses and the parties are a bit closer to resolving their dispute.

On the discovery end, written discovery demands have been exchanged, and their responses have also been exchanged. In the past week, both plaintiffs have been deposed and the only discovery that remains outstanding is the Defendants' deposition and any follow-up document discovery that will be sought as a result of each litigant's deposition testimony. Thus, the case is well underway for resolution.

Defendants' deposition has been scheduled for June 13th but, unfortunately, because your undersigned's departure from the law firm of Varacalli & Hamra, LLP, this office is seeking to adjourn his deposition for 30 days. Because the discovery deadline is set to close on June 14, 2018, any adjournment will require the Court's approval, and an Order from Your Honor extending the discovery deadline. The partners of this firm require this additional time to find an attorney to replace your undersigned and/or to get caught up with the facts and case law that is relevant to this case in order to conduct the deposition of Defendants themselves.

Accordingly, Plaintiffs respectfully request a 60 day extension of the discovery deadline to complete Defendants' deposition and to respond to any follow-up document discovery that may be sought after each litigant's deposition. Defendants consent to this request.

Thank you for your time and consideration.

Truly Yours,

/s/ Salim Katach
Salim Katach (SK0924)